

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIRIAM FULD, et al.,

Plaintiffs,

v.

PALESTINE LIBERATION ORGANIZATION,
et al.,

Defendants.

Case No. 20 Civ. 3374 (JMF)

DECLARATION OF JEFFREY FLEISCHMANN

Jeffrey Fleischmann hereby declares as follows:

1. I am a member of the bar of this Court and of the Jeffrey Fleischmann law firm. I serve as counsel for plaintiffs in the above-captioned case. I make this declaration to place documents and information before the Court relevant to the issue of defendants' consent to the exercise of personal jurisdiction in this case under the Promoting Security and Justice for Victims of Terrorism Act, Pub. L. No. 116-94, § 903 (PSJVTA).

2. Attached as Exhibit A is a copy of a June 22, 1994 letter from Eric J. Boswell, the Director of the U.S. Office of Foreign Missions, to Hasan Abdel Rahman of the Palestinian Affairs Center.

3. Attached as Exhibit B is a copy of Hakam Takash's May 21, 2012 FARA Short-Form Registration Statement, filed with the U.S. Department of Justice.

4. Attached as Exhibit C is a copy of the internet archive of the "consular affairs" section of the website "plodelegation.org" from September 10, 2018.

5. Attached as Exhibit D is a copy of an excerpt of defendants' October 9, 2018 FARA Supplemental Statement, filed with the U.S. Department of Justice.

6. Attached as Exhibit E is a transcript of a portion of a KPFA radio interview on October 11, 2018, with Hakam Takash, an employee in defendants' Washington, D.C. office at the time.

7. Attached as Exhibit F is a translated copy of an article by Said Ereket in the Arabic-language newspaper Al-Quds, published on November 10, 2018.

8. Attached as Exhibit G is a copy of an amicus brief filed by the United States on March 13, 2019, in *Klieman v. Palestinian Authority*, No. 15-7034 (D.C. Cir. Mar 13, 2019).

9. Attached as Exhibit H is a copy of a June 19, 2019 letter from Secretary of State Michael R. Pompeo to Senator Charles E. Grassley.

10. Attached as Exhibit I is a copy of a public statement given by President Mahmoud Abbas before the U.N. Security Council on February 11, 2020, which was published on defendants' U.N. website.

11. Attached as Exhibit J is a copy of Squire Patton Boggs's July 31, 2020 FARA Supplemental Statement, filed with the U.S. Department of Justice.

12. Attached as Exhibit K is a transcript of an interview between Ambassador Riyad Mansour and the American-Arab Anti-Discrimination League on October 22, 2020.

13. Attached as Exhibit L is a transcript of an undergraduate seminar at Seton Hall University that Ambassador Riyad Mansour participated in on November 19, 2020.

14. Attached as Exhibit M is a copy of the deposition transcript of Awni Abu Hdba conducted on April 7, 2021, for the case *Shatsky v. Palestine Liberation Organization*, No. 18 Civ. 12355 (MKV) (S.D.N.Y).

15. Attached as Exhibit N is a copy of the deposition transcript of Fuad Ateyeh conducted on April 8, 2021, for the case *Shatsky v. Palestine Liberation Organization*, No. 18 Civ. 12355 (MKV) (S.D.N.Y.).

16. Attached as Exhibit O is a copy of a pre-printed draft "Contract for Notary Services" between defendants and Awni Abu Hdba.

17. Attached as Exhibit P is a copy of a February 13, 2020 U.S. State Department entitled "Report to Congress Regarding Palestinian Payments for Acts of Terrorism" that was provided to Congress pursuant to the Taylor Force Act, Pub. L. 115-141, div. S, title X, § 1004(e) (codified at 22 U.S.C. § 2378c-1(e)).

18. Attached as Exhibit Q is an excerpted copy of defendants' Twitter feed, which published a trailer for a film about surfing in Gaza on April 6, 2021.

19. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 6, 2021



Jeffrey Fleischmann